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15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 KEVIN BROWN, an individual; JENNIFER
19 BROWN, an individual;

20 Plaintiffs,

21 v.

22 SAM'S WEST, INC.; ADVANTAGE
23 SALES AND MARKETING, LLC and
24 DOES 1 through 100;

25 Defendants.

26 Case No. 2:15-cv-01964-LDG-CWH

27 **STIPULATION AND [PROPOSED]
28 ORDER EXTENDING TIME FOR
PLAINTIFFS TO FILE OPPOSITION TO
DEFENDANT SAM'S WEST, INC.'S
MOTION TO EXCLUDE PLAINTIFFS'
EVIDENCE AND DAMAGES RELATED
TO PLAINTIFF JENNIFER BROWN'S
CLAIM OF LOSS OF CONSORTIUM
PURSUANT TO FRCP 37 AND ANY
JOINDERS THERETO**

29 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, the undersigned counsel of record for
30 Plaintiffs, Kevin Brown and Jennifer Brown, Defendant, Sam's West, Inc., and Defendant,
31 Advantage Sales & Marketing, LLC, hereby STIPULATE to extend the time for Plaintiffs to
32 file an Opposition to Defendant Sam's West, Inc.'s Motion to Exclude Plaintiffs' Evidence and
33 Damages Related to Plaintiff Jennifer Brown's Claim of Loss of Consortium (ECF No. 82) (the
34 "Motion") and any joinders thereto. Defendant Sam's West, Inc. filed its Motion on November
35 14, 2017. Defendant Advantage Sales & Marketing, LLC filed a Joinder to the Motion on
36 November 15, 2017. (ECF No. 83). Plaintiffs' Opposition is currently due on November 28,

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1 2017. If approved, the foregoing parties have agreed to a one-day extension to file the
2 Opposition, which would make it due on November 29, 2017. This is the first stipulation
3 seeking to extend the Opposition deadline.

4 Plaintiffs submits that good cause exists to approve the requested stipulation as the
5 requested one-day extension will provide Plaintiffs with sufficient time to address the
6 arguments raised by Defendant Sam's West, Inc. in the Motion.

7 DATED this 27th day of November, 2017.

8 CHRISTIANSEN LAW OFFICES

9
10 /s/ Keely A. Perdue, Esq.
By _____
11 PETER S. CHRISTIANSEN, ESQ.
12 R. TODD TERRY, ESQ.
13 KEELY A. PERDUE, ESQ.
14 *Attorneys for Plaintiffs*

DATED this 28th day of November, 2017.

PHILLIPS, SPALLAS & ANGSTADT, LLC

/s/ Pooja Kumar, Esq.
By _____
1 ROBERT K. PHILLIPS, ESQ.
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4 *Attorneys for Defendant Sam's West, Inc.*

DATED this 27th day of November, 2017.

MURCHISON & CUMMING, LLP

/s/ Michael J. Nunez, Esq.
By _____
1 MICHAEL J. NUNEZ, ESQ.
Nevada Bar No. 10703
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4 *Attorneys for Defendant Advantage Sales &*
Marketing, LLC

IT IS SO ORDERED.

25 By _____
26 *CJH*
UNITED STATES MAGISTRATE JUDGE

27 November 29, 2017
28 Dated: _____

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this 28th day of November, 2017, a copy of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR PLAINTIFFS TO FILE OPPOSITION TO DEFENDANT SAM'S WEST, INC.'S MOTION TO EXCLUDE PLAINTIFFS' EVIDENCE AND DAMAGES RELATED TO PLAINTIFF JENNIFER BROWN'S CLAIM OF LOSS OF CONSORTIUM PURSUANT TO FRCP 37 AND ANY JOINDERS THERETO** was filed and served through the Court's electronic filing system (CM/ECF) upon all registered parties and their counsel.


An employee of Christiansen Law Offices